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May 17, 2024

The Honorable Valerie E. Caproni  
United States District Court Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007  
**Via ECF**

**MEMO ENDORSED**

**Re: Alla Kiseleva v Adam Litman et al., 1:23-cv-09496-VEC**

Your Honor:

I represent the Plaintiff in the above titled matter. I write pursuant to Your Honor's Individual Rules to respectfully request an adjournment of the Initial Pretrial Conference ("IPTC"), currently scheduled to be held on June 14<sup>th</sup>, 2024 at 10:00 am. My daughter's high school graduation ceremony will take place on the same date and at the same time, and I respectfully request that the IPTC be rescheduled to the next date convenient for the Court, so that I may attend this important event.

This is the second request for adjournment or extension in this matter. The first request, seeking an extension of time to file an order to show cause why default judgment should not be entered against all defendants, also made by Plaintiff, was granted by the Court on February 13, 2024.

Defendants consent to this request, and both parties jointly propose the following alternative dates: June 21<sup>st</sup>, July 12<sup>th</sup>, and July 19<sup>th</sup>, 2024. Should the Court wish to reschedule the IPTC on a day other than a Friday, the parties can appear on any day during the week beginning June 17<sup>th</sup> 2024, as well as on July 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup>.

Given the nature of the undersigned's scheduling conflict, it is respectfully requested that the Court grant this request that the IPTC be adjourned.

Respectfully Submitted,

/s/ Anuradha Lazarre  
Anuradha Lazarre

cc: **Via ECF**  
Leonard Flamm, Esq.  
LAW OFFICES OF LEONARD N FLAMM  
  
Howard Schragin, Esq.  
SAPIR SCHRAGIN LLP

Application GRANTED. The Initial Pretrial Conference scheduled for Friday, June 14, 2024, at 10:00 A.M. is ADJOURNED to **Friday, June 21, 2024, at 10:00 A.M.** The deadline for the parties to submit a joint proposed case management plan and joint letter, containing the information described in the Order at Dkt. 43 at 2, is extended from Thursday, June 6, 2024, to **Thursday, June 13, 2024.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE